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November 14, 2018

VIA CERTIFIED MAIL

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105
(415) 947-4251

Re: Freedom of Information Act Request

Dear FOIA Administrator:

This letter is submitted pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and requests access to, or copies of, the following public records in the possession, custody, or control of the United States Environmental Protection Agency (“EPA”) Region 9:

1. All documents relating to or concerning the Modesto Groundwater Superfund Site;
2. All documents relating to or concerning any sampling, testing, investigation, or analysis of potential or actual exposure to volatile organic chemicals (“VOCs”) from any current or former dry cleaning operation in Modesto, California;
3. All documents relating to or concerning any sampling, testing, investigation, or analysis of tetrachloroethylene (“PCE”)¹ in soil, soil gas, or groundwater from any current or former dry cleaning operation in Modesto, California;
4. All documents relating to or concerning any sampling, testing, investigation, or analysis of the presence of PCE in indoor air in Modesto, California;

¹ PCE is a chlorocarbon with the formula $\text{Cl}_2\text{C}=\text{CCl}_2$, and is also known as tetrachloroethene, perchloroethylene, “perc,” “PERC,” and many other names.

5. All documents relating to or concerning any sampling, testing, investigation, or analysis of PCE volatilizing and entering any building as a gas (i.e., vapor intrusion) in Modesto, California;
6. All documents relating to or concerning any past or present effort to remediate or remove PCE from soil, soil gas, or groundwater in Modesto, California;
7. All documents relating to or concerning any past or present effort to remediate or remove PCE from indoor air in Modesto, California; and
8. All documents relating to or concerning any past or present effort to address vapor intrusion of PCE in Modesto, California.

For purposes of this request:

1. The terms “and” and “or” are used herein as terms of inclusion and not of exclusion and shall have both conjunctive and disjunctive meanings, and the words “any” and “all” mean each and every.
2. The term “documents” shall mean any and all public records, including without limitation reports, records, drafts, letters, memoranda, notes, communications, inspection reports, logs, tables, spreadsheets, books, photographs, electronic files, emails, facsimiles, diagrams, documents, and every other means of recording upon any tangible thing any form of communication or representation.
3. The terms “relating to” or “concerning” mean in whole or in part to discuss, describe, reflect, memorialize, contain, analyze, study, report on, comment on, evidence, constitute, embody, identify, state, consider, recommend, set forth, concern, address, deal with or in any way pertain to.

If, for any reason, EPA Region 9 decides to withhold or otherwise redact information contained in its files relating to the public records described above on the basis of privilege or otherwise, please provide a statement describing the nature of any such material and the basis for any such decision, citing the legal authorities on which EPA Region 9 relies. Please also set forth any appeal procedures available under law.

We hereby agree to pay copying costs and other reasonable costs necessary for the above requested documents up to five hundred dollars (\$500.00). In the event such fees may be in excess of five hundred dollars (\$500.00), please contact me prior to incurring any costs. In the alternative, we are amenable to electronic disclosure of the records requested to the extent that such disclosure is more convenient and may be made in a more expeditious fashion. To the extent any of the records responsive to this request are stored in electronic format, please also provide a copy of the records in their native electronic format on CD-ROM or other media that will enable us to load the records onto a computer. When providing electronic records, please

include metadata. To the extent that certain reports and/or data are available before others, we ask that you please provide such documents on a rolling basis.

If you have any questions regarding this request, please feel free to contact me by email at laura.solancho@tr.com. Thank you in advance for your attention to this matter.

Very truly yours,

/s/ Laura Solancho

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